

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROTHSCHILD BROADCAST
DISTRIBUTION SYSTEMS, LLC,

Plaintiff,

v.

THE TEACHING COMPANY, LLC,

Defendant.

Cause No. 1:23-cv-00298-MN

JURY TRIAL DEMANDED

**DEFENDANT'S MOTION TO DISMISS
FOR FAILURE TO STATE A CLAIM**

Pursuant to D. Del. LR 7.1.2, Defendant The Teaching Company, LLC respectfully moves this Court to dismiss Plaintiff Rothschild Broadcast Distribution Systems, LLC's Complaint, pursuant to Federal Rule of Civil Procedure 12(b)(6), for failure to state a claim upon which relief can be granted.

The grounds for this motion are further set forth in Defendant's Opening Brief in Support of its Motion to Dismiss for Failure to State a Claim, which is being filed contemporaneously herewith.

Dated: April 10, 2023

Respectfully submitted,

By: /s/ Jeremy D. Anderson

Jeremy D. Anderson (Bar No. 4515)
222 Delaware Avenue, 17th Floor
Wilmington, Delaware 19801
(302) 652-5070 (Telephone)
(302) 652-0607 (Facsimile)
janderson@fr.com

Neil J. McNabney (*pro hac vice* forthcoming)
Ricardo J. Bonilla (*pro hac vice* forthcoming)
Michael A. Vincent (*pro hac vice* forthcoming)
1717 Main Street, Suite 5000
Dallas, Texas 75201
(214) 747-5070 (Telephone)
(214) 747-2091 (Facsimile)
macnabney@fr.com
rbonilla@fr.com
vincent@fr.com

**COUNSEL FOR DEFENDANT
THE TEACHING COMPANY, LLC**